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Counsel for defendant SHAC LLC d/b/a Sapphire Gentlemen's Club

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ABIGAIL ORTIZ, individually and on behalf
of herself and all others similarly situated,

Plaintiff,

v.

SHAC LLC d/b/a SAPPHIRE
GENTLEMEN'S CLUB; and DOES 1 to 10,

Defendants.

Case No.: 2:20-cv-621-KJD-BNW

**STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME FOR
DEFENDANT TO RESPOND TO
COMPLAINT**

(First Request)

IT IS HEREBY STIPULATED AND REQUESTED by and between Plaintiff Abigail Ortiz and Defendant SHAC LLC d/b/a Sapphire Gentlemen's Club, through their respective counsel and pursuant to Local Rules IA 6-1, LR IA 6-2, and LR 7-1, that the Court extend the deadline for Defendant to respond to Plaintiff's Complaint by two weeks, up to, and including, **July 8, 2020**.

This is a proposed class action for alleged violations of the Telephone Consumer Protection Act, 47 U.S.C. §§ 227, *et seq.* ECF No. 1. Counsel for the parties are engaged in preliminary efforts to resolve this matter without the need for litigation and submit this stipulation for a brief extension of time in order to facilitate those efforts, taking into account the exercise of due diligence.

1 This is the first stipulation for an extension of time to respond to the Complaint, and it is
2 made in good faith and not for purposes of delay.

3 IT IS SO STIPULATED.

4 Dated this 23rd day of June 2020.

Dated this 23rd day of June 2020.

5 **KAZEROUNI LAW GROUP, APC**

GREENBERG TRAURIG, LLP

6 /s/ Gustavo Ponce

/s/ Jason Hicks

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9 *Counsel for Plaintiff*

*Counsel for defendant SHAC LLC d/b/a
Sapphire Gentlemen's Club*

15 **IT IS SO ORDERED.**

16 

17 UNITED STATES MAGISTRATE JUDGE

18 Dated June 25, 2020